

- IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Mr. Liu. This includes assurances that Mr. Liu will abide by any conditions of pre-trial release, not violate any laws, and that he will appear for all court appearances.

7. The U.S. Probation Office has interviewed the third party custodian. After the interview, they deemed that he was not suitable due to his lack of knowledge of Mr. Liu. However, the custodian has met Mr. Liu on at least one occasion and is a very close family friend of Mr. Liu's girlfriend and her extended family. Moreover, the custodian is otherwise suitable considering his ability to provide housing, his employment with courts, lack of criminal history, and assurances that he will be accountable for Mr. Liu. In addition, Mr. Liu has a long time friend that resides in Philadelphia. This person has also said that they would periodically visit Mr. Liu and ensure that he is compliant with all conditions.

8. Mr. Liu has no criminal history, nor history of drug abuse. The charged offenses are non-violent in nature and Mr. Liu's alleged involvement is centered on financial transactions. Mr. Liu was compliant and did not attempt to flee from federal agents at the time of his arrest.

9. Mr. Liu has a reputation of being charitable to those in need. In the past, he has volunteered to dress up as Santa Claus and provide gifts to children that may not have otherwise received anything for Christmas. He also volunteers time and money during the Chinese New Year. He works with different associations in New York City to provide services and monetary resources that are needed in the community.

10. Since his detention at the Alexandria Detention Center, Mr. Liu has been kept in administrative segregation, which equates to solitary confinement. He is released for a "break" for approximately two hours each day. During this short period, he is allowed to make phone calls, walk for exercise, and watch television. Mr. Liu does not speak English and is unable to communicate with others while detained.

11. Mr. Liu is the father of four (4) children. This includes a child with his longtime girlfriend who resides in New York City. They have a two year old daughter together.

12. Mr. Liu was born in China, but he has spent a significant amount of time in the United States. He has ties to this country that include his girlfriend, child, friends, and membership in various charitable organizations.

13. Mr. Liu is 46 years old and suffers from both diabetes and poor blood pressure. Both health conditions are known to cause complications if someone were to contract the deadly Covid-19 virus. His blood pressure condition is so chronic that he takes medicine to control it. Mr. Liu's inability to speak English has been a barrier to him receiving proper medical attention while detained.

14. Mr. Liu's eldest daughter is currently experiencing health issues and has required hospitalization recently. Due to restrictions, Mr. Liu has been unable to have any contact with his daughter. He is very concerned about her health and is distraught that she is ill.

WHEREFORE, Mr. Liu respectfully requests that this court release him from the Alexandria Detention Center and place him on GPS monitoring and supervision while living with the identified third party custodian in Ashburn, Virginia.

Respectfully Submitted,
Tao Liu
By counsel

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CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2021 I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David Peters, Esquire
Mary Daly, Esquire
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